<u>REMARKS</u>

I.   INTRODUCTION

In response to the Office Action dated September 7, 2005, claims 1, 10, and 19 have been amended. Claims 1, 3-10, 12-19, and 21-30 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

II.   PRIOR ART REJECTIONS

In paragraphs (2)-(3) of the Office Action, claims 1, 3-6, 9, 10, 12-15, 18, 19, 21-24, and 27-30 were rejected under 35 U.S.C. §102(e) as being anticipated by Duffy et al., U.S. Publication No. 2003/0212610 (Duffy). In paragraphs (12)-(13) of the Office Action, claims 7, 8, 16, 17, 25, and 26 were rejected under 35 U.S.C. §103(a) as being unpatentable over Duffy in view of Jones et al., U.S. Patent No. 6,493,731 (Jones).

Specifically, the independent claims were rejected as follows:

> As per claim 1, Duffy discloses a method for distributing design document changes comprising:
> (a) capturing an extensible markup language (XML) representation of a revision block of a design document (storing a specification, which has all the details of a design document, including any changes, in an xml format; paragraph 0038-0040, 0045, 0066-0070), wherein:
> (i)   the revision block documents a history of one or more changes made directly by one or more users to the design document (the specification stores and tracks any changes made to the document and logs details of the changes; 0040, 0075); and
> (ii) the revision block comprises a date for each change made directly by the one or more users to the design document (0040); and
> (b) distributing the representation via a network service (the specification and the history of all the changes are available over a network0045).

> Claims 10, 12-15, 18, 19, 21-24, 27, 29, and 30 are rejected with the same rationale as claims 1, 3-6, 9, and 28 because they disclose an apparatus and article of manufacture for the invention, but have the same limitations as claims 1, 3-6, 9, and 28.

Applicant traverses the above rejections for one or more of the following reasons:

(1)   Neither Duffy nor Jones teach, disclose or suggest a revision block of a design document;

(2)   Neither Duffy nor Jones teach, disclose or suggest a revision block of a design document wherein each row of the revision block represents a change to the design document;

(3)   Neither Duffy nor Jones teach, disclose or suggest each row of the revision block having a date for the change represented in the row;

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(4)   Neither Duffy nor Jones teach, disclose or suggest that each row in the revision block is represented by an XML revision element with sub-elements that define the change represented in the row; and

(5)   Neither Duffy nor Jones teach, disclose or suggest distributing the XML representation of the revision block without distributing the design document itself.

Independent claims 1, 10, and 19 are generally directed to the use of design document revision blocks. As set forth in the prior art, revision blocks for design documents (e.g., blueprints, drawings, etc.) in the architectural, engineering, and construction fields provide information relating to changes to the design document. In the prior art, when a design document was changed, the entire design document was transmitted with the revision block incorporated therein to describe the changes. Such a methodology was inefficient and slow.

The present invention overcomes the difficulties of the prior art. Firstly, the amended claims provide for details relating to the revision block; namely, each row of the revision block represents a change made to the design document. Further, each row has a date that the change represented by the row was made. Further, the revision block and various rows of the revision block are represented/captured in XML. In this regard, each row of the revision block is represented by an XML revision element with sub-elements that define the change represented in the row. Accordingly, specific details relating to the XML representation are set forth in the claims.

In addition to the above, the amended claims further provide for distributing the XML representation without transmitting the design document itself. In this regard, rather than forcing the user to open the design document or transmitting a large drawing file of the design document, the invention enables the user to merely transfer the XML representation and does not transmit the design document with the XML representation.

The cited references do not teach nor suggest these various elements of Applicant's independent claims. The independent claims were rejected under 35 USC 102(e) based on Duffy. Applicants submit that the amended claims overcome the various rejections for at least one or more of the reasons set forth above. Firstly, the concept of a revision block is completely and totally absent from Duffy. The only reference, in Duffy, to changes and the history of changes are described in paragraphs [0040], [0075], [0105], and [0109]. However, such a description does not even remotely reflect a revision block of a design document as described in the specification and set

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forth in the amended claims. Specifically, Duffy completely fails to describe rows in a revision block wherein each row represents/defines a change to the design document. The use of such rows in a revision block is notoriously absent from Duffy.

In addition to the lack of a revision block description and rows of a revision block description, Duffy also fails to teach, disclose, or suggest the particular manner in which XML is used to represent the revision block as claimed. The claims explicitly provide that each row in the revision block is represented by an XML revision element. Further, sub-elements of the revision element define the change represented in the row. Thus, the claims explicitly provide for a particular manner and use of XML. Such a teaching is not taught, disclosed, hinted at, or alluded to in Duffy. Instead, Duffy merely describes the use of a change module 608 (see paragraph [109]) and elsewhere states that specification information can me communicated using XML. Such a teaching is not even remotely similar to the specifically claimed XML elements and sub-elements set forth in the claims.

There may be many ways to represent a change to Duffy's specification or component of Duffy's specification. For example, a text file that describes the changes could be utilized. Alternatively, HTML that has textual descriptions of the changes could be used. However, none of such examples describe the explicit and specific elements and sub-elements of the claims of the present invention.

Further, as described above, the claims provide for distributing the XML representation via a network service without transmitting the design document that the changes were made to. Duffy completely fails to provide for any such transmission. There is no indication in Duffy that indicates that Duffy's history of changes is transmitted via a network service. Further, Duffy also fails to teach or suggest that Duffy's history of changes is transmitted without the specification itself (i.e., to which the changes were made). Instead, Duffy consistently describes transmitting specification information (see paragraph [0045]). However, such a description fails to describe any communication or transmission without the specification itself. In this regard, there is no indication, explicit or implicit, that describes such a transmission.

Accordingly, the various elements of Applicant's claimed invention together provide operational advantages over the systems disclosed in Duffy and Jones. In addition, Applicant's invention solves problems not recognized by Duffy and Jones.

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Thus, Applicant submits that independent claims 1, 10, and 19 are allowable over Duffy and Jones. Further, dependent claims 3-9, 12-18, 21-30 are submitted to be allowable over Duffy and Jones in the same manner, because they are dependent on independent claims 1, 10, and 19, respectively, and because they contain all the limitations of the independent claims. In addition, dependent claims 3-9, 12-18, 21-30 recite additional novel elements not shown by Duffy and Jones.

III.   CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.
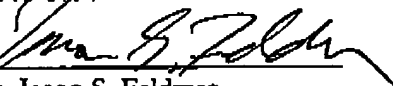
Respectfully submitted,

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